

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

WACO DIVISION

MIDAS GREEN TECHNOLOGIES, LLC,
-VS.-
RHODIUM ENTERPRISES, INC.; RHODIUM
TECHNOLOGIES LLC; RHODIUM 10MW LLC; RHODIUM
2.0 LLC; RHODIUM 30MW LLC; RHODIUM ENCORE LLC;
RHODIUM INDUSTRIES LLC; RHODIUM JV LLC;
RHODIUM RENEWABLES LLC; RHODIUM SHARED
SERVICES LLC; RHODIUM SHARED SERVICES PR INC.;
CHASE BLACKMON; CAMERON BLACKMON; AND
NATHAN NICHOLS,

Case No.: 6:22-cv-00050-ADA

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Ashley Ross, applicant herein, and
moves this Court to grant admission to the United States District Court for the Western District of
Texas pro hac vice to represent Rhodium Enterprises, Inc. et al. in this case, and
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)
Kirkland & Ellis LLP with offices at:
Mailing address: 601 Lexington Avenue
City, State, Zip Code: New York, NY 10022
Telephone: 212-446-4800 Facsimile: 212-446-4900
2. Since 12/08/2014, Applicant has been and presently is a
member of and in good standing with the Bar of the State of New York.
Applicant's bar license number is 5303706.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>New York State Court</u>	<u>12/08/2014</u>
<u>US Court of Federal Claims</u>	<u>09/25/2017</u>
<u>US District Court, SDNY</u>	<u>5/30/2017</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. I ☒ have ☐ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: 6:21-cv-00690-ADA on the 29 day of March, 2022 .

Number: _____ on the _____ day of _____, _____.

Number: _____ on the _____ day of _____, _____.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Kat Li Kirkland & Ellis LLP

Mailing address: 401 Congress Ave

City, State, Zip Code: Austin, TX 78701

Telephone: 512-678-9100


Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-l(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Ashley Ross to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Ashley Ross

[printed name of Applicant]



[signature of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 14th day of July, 2022.

Ashley Ross

[printed name of Applicant]


[signature of Applicant]

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ORDER

BE IT REMEMBERED on this day, there was presented to the Court the Motion for Admission Pro Hac Vice filed by Ashley Ross, counsel for Rhodium Enterprises, Inc. et al., and the Court, having reviewed the motion, enters the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and Ashley Ross may appear on behalf of Rhodium Enterprises, Inc. et al. in the above case.

IT IS FURTHER ORDERED that Ashley Ross, if he/she has not already done so, shall immediately tender the amount of \$100.00, made payable to: **Clerk, U.S. District Court**, in compliance with Local Court Rule AT-l(f)(2).

SIGNED this the _____ day of _____, 20 22 .

UNITED STATES DISTRICT JUDGE